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October 5, 2011

Ms. Kathleen Harder

Central Valley Regional Water Quality Control Board

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**Sacramento Regional Wastewater  
Treatment Plant**

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**Board of Directors  
Representing:**

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

**Subject: Sacramento Regional County Sanitation District's Comments on  
the Tentative Order Amending Waste Discharge Requirements  
and Tentative Time Schedule Order for the Sacramento Regional  
Wastewater Treatment Plant**

Dear Ms. Harder:

The Sacramento Regional County Sanitation District (SRCS D) supports the proposed amendments of the Waste Discharge Requirements (WDR) and Time Schedule Order (TSO) for the Sacramento Regional Wastewater Treatment Plant (SRWTP) which was circulated for public comments on September 16, 2011. The proposed changes in the WDR and TSO help to clarify many of the permit provisions but make no substantive changes that will change the permit's provisions with respect to protecting water quality standards.

We submit the following comments to ensure consistency throughout the Resolution, WDR, and TSO, and to ensure consistency with the Central Valley Regional Board's February 22, 2011 letter. Suggested new text is underlined and deleted text is denoted by ~~striketrough~~:

- 1) **Draft Resolution, Pg 4, Item 8** - The last sentence should be corrected as noted to be consistent with the WDR: "Order R5-2010-0114 is modified to include an annual technical report on the water quality for TDS; and EC ~~and standard minerals~~ for the municipal water supply and eliminates the Municipal Water Supply Monitoring in the MRP."
- 2) **Draft Resolution, Pg 4, Item 10** - "The Discharger does not know why the grab samples ~~are higher and is concerned about violating the annual mass mercury limit~~ demonstrate a systematic bias for higher concentrations but is confident that historic sampling based on 24-hour composites represents the most accurate determination of effluent mercury concentrations. The interim effluent water quality limit based on performance is calculated using the historical composite results for mercury."

Stan Dean  
District EngineerRuben Robles  
Director of OperationsPrabhakar Somavarapu  
Director of Policy & PlanningKaren Stoyanowski  
Director of Internal ServicesJoseph Maestretti  
Chief Financial OfficerClaudia Goss  
Public Affairs Manager

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- 3) **Monitoring and Reporting Program, Pg E-4, III.A.1** - Footnote 2 to Table E-2a Influent Monitoring is requested to be revised as noted in Central Valley Regional Board's letter dated February 22, 2011-- "~~Grab samples to be collected during the calibration and cleaning of whenever the continuous pH meter is offline for 30 minutes or longer.~~"
- 4) **Factsheet, Pg F-115, Municipal Water Supply Annual Report** - "The Discharger shall submit an annual report characterizing the water supply water quality. The water supply characterization will include data from the water purveyors and other databases. The water supply characterization report will provide a weighted average of groundwater and surface water TDS, and EC ~~standard minerals~~. ~~The purpose of this monitoring is to evaluate the efficacy of salt minimization plans.~~"

We request that these revisions be made to the Factsheet and draft Resolution to ensure consistency and clarity in the proposed amendments. If there are any questions on these comments, please contact Robert Seyfried at [seyfriedr@sacsewer.com](mailto:seyfriedr@sacsewer.com) or 916-876-6068.

Sincerely,



Prabhakar Somavarapu  
Director of Policy and Planning

cc: James Marshall, CVRWQCB  
Stan Dean, SRCSD District Engineer  
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